

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
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SUBJECT: Risk-Based Concentration Table

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TO: RBC Table Users

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Attached is the EPA Region III Risk-Based Concentration (RBC) Table, which we prepare and post periodically for all interested parties. The Table's current web address is <http://www.epa.gov/reg3hwmd/risk/human/index.htm>

For questions about the Table, please consult this memo. You can also consult the RBC Table companion documents, such as the Technical Background Document and Frequently Asked Questions, that are posted on the website. If you don't find the answer there, and your question is about risk assessment or the science behind the RBCs, you can reach me at hubbard.jennifer@epa.gov or 215-814-3328. For technical difficulties in reading, displaying, or downloading the table from the web, please contact burton.talisha@epa.gov.

BASIC INFORMATION

The RBC Table contains Reference Doses (RfDs) and Cancer Slope Factors (CSFs) for about 400 chemicals. These toxicity factors have been combined with "standard" exposure scenarios to calculate RBCs--chemical concentrations corresponding to fixed levels of risk (i.e., a Hazard Quotient (HQ) of 1, or lifetime cancer risk of 1E-6, whichever occurs at a lower concentration) in water, air, fish tissue, and soil. The equations and the exposure factors are shown in the RBC Table companion memo, the Technical Background Document.

The Region III toxicologists use RBCs to screen sites not yet on the NPL, respond rapidly to citizen inquiries, and spot-check formal baseline risk assessments. The primary use of RBCs is for chemical screening during baseline risk assessment (see EPA Regional Guidance EPA/903/R-93-001, "Selecting Exposure Routes and Contaminants of Concern by Risk-Based Screening"). The exposure equations come from EPA's Risk Assessment Guidance for Superfund (RAGS), while the exposure factors are those recommended in RAGS or supplemental guidance from the Superfund program. The attached Technical Background Document provides specific equations and assumptions. Simply put, RBCs are like risk assessments run in reverse. For a single contaminant in a single medium, under standard default exposure assumptions, the RBC corresponds to the target risk or hazard quotient.

RBCs also have several important limitations. Specifically excluded from consideration are (1) transfers from soil to air, (2) cumulative risk from multiple contaminants or media, and (3) dermal risk. Additionally, the risks for inhalation of vapors from water are based on a very simple model, whereas detailed risk assessments may use more detailed showering models. Many RBCs are also based on adult risks. For more information about children's risks, see the Technical Background Document and Frequently Asked Question #12. Furthermore, the toxicity information in the Table has been assembled by hand and (despite extensive checking and years of use) may contain errors. It's advisable to cross-check before relying on any RfDs or CSFs in the Table. If you note any errors, please let us know.

It is important to note that, at this time, the Table uses inhalation RfDs and CSFs rather than RfCs (Reference Concentrations) and inhalation unit cancer risks. This was initially done because the latter factors incorporate exposure assumptions and were ostensibly based on residential adults. Because risk assessors needed to evaluate risks for many types of scenarios, the factors were converted to the more traditional RfDs and CSFs. Unless otherwise indicated in the toxicity-factor source, the assumption was that RfCs and unit risks should be adjusted by a 70-kilogram body weight and a 20 m³/day inhalation rate to generate the RfDs and CSFs. In fact, for adults, the use of an inhalation RfD vs. an RfC does not typically change the risk estimate significantly.

Many users want to know if the RBCs can be used as valid no-action levels or cleanup levels, especially for soils. The answer is a bit complex. First, it is important to realize that the RBC Table does not constitute regulation or guidance, and should not be viewed as a substitute for a site-specific risk assessment. For sites where:

- A single medium is contaminated;
- A single contaminant contributes nearly all the health risk;
- Volatilization, dermal contact, and other pathways not included in the RBCs are not expected to be significant;
- The exposure scenarios and assumptions used in the RBC table are appropriate for the site;
- The fixed risk levels used in the RBC table are appropriate for the site; and
- Risk to ecological receptors is not expected to be significant;

the RBCs would probably be protective as no-action levels or cleanup goals. However, to the extent that a site deviates from this description, as most do, the RBCs would not necessarily be appropriate.

To summarize, the Table should generally not be used to set cleanup or no-action levels at CERCLA sites or RCRA Corrective Action sites, to substitute for EPA guidance for preparing baseline risk assessments, or to determine if a waste is hazardous under RCRA.

FEATURES OF THE TABLE

The RBC Table was originally developed by Roy L. Smith, Ph.D., for use by risk

assessors in the Region III Superfund program. Dr. Smith is no longer with Region III, and the Table continues to evolve. The following features of the table should be noted; some of the current features differ from those of past versions of the RBC Table.

WHAT'S NEW

The two most significant changes to the April 2005 Table are the deletion of some chemicals (and the addition of one), and the incorporation of a new source of toxicity information.

In our continuing efforts to streamline the Table, we have eliminated chemicals that are not typically analyzed for or found at Region III Superfund sites. These chemicals are: 4-aminopyridine, antimony pentoxide, antimony tetroxide, azobenzene, butylate, chlorobenzilate, p-chlorobenzoic acid, 1-chlorobutane, cyanazine, cyanogen bromide, cyanogen chloride, 1,4-dichloro-2-butene, dicyclopentadiene, 2,4-dimethylaniline hydrochloride, 2,4-dimethylaniline, 2-ethoxyethanol, ethylene thiourea, ethyl methacrylate, formic acid, furazolidone, glycidaldehyde, hexazinone, isopropalin, isopropyl methyl phosphonic acid, methacrylonitrile, 2-methyl-5-nitroaniline, nitrofurantoin, nitrofurazone, N-nitroso-N-ethylurea, 2-phenylphenol, p-phthalic acid, propanil, ronnel, selenious acid, sodium azide, trimethyl phosphate, vanadium pentoxide, vanadium sulfate, and zinc phosphide. If any of these chemicals are important to your Superfund site, please send an email to the address on page 1 of this memo, and we will consider restoring it to the Table. One chemical was added to the Table: perchlorate, which recently appeared on IRIS.

EPA's National Center for Environmental Assessment (NCEA) is the main source of provisional toxicity values for chemicals without IRIS values. Recently, NCEA has recommended ATSDR chronic MRLs for some chemicals, consistent with their description in OSWER Directive 9285.7-53 as Tier 3 toxicity values. In keeping with this, the Region III RBC Table now includes some MRLs as provisional values, coded "M" on the Table. MRLs were only used in the following cases: 1) if there was no IRIS (Tier 1) or current PPRTV (Tier 2) value; 2) if the MRL was more recent than the provisional or HEAST value; and 3) if the MRL was chronic.

FEATURES AND HISTORICAL CHANGES

As usual, updated toxicity factors have been used wherever available. However, because IRIS and provisional values are updated more frequently than the RBC Table, RBC Table users are ultimately responsible for obtaining the most up-to-date values. The RBC Table is provided as a convenience, but toxicity factors are compiled from the original sources and it is those original sources that should serve as the definitive reference.

Changes to the table since the last semi-annual version have been marked with asterisks (**). Changes may involve a corrected CAS number or a correction in the VOC status, a

change in the SSL, or changes of RfDs and CSFs or their sources.

For access to “P” and “E” coded values, please see Frequently Asked Question #10 for more information.

Please note that the “industrial soil” numbers were changed on the April 2003 RBC Table to reflect the higher soil ingestion rate of the outdoor worker. This is consistent with the new draft SSL Guidance and with the practice in other regions, as well as providing for additional protection of workers.

RBCs are not rounded to 1E6 ppm, as they were in some earlier versions of the Table. For certain low-toxicity chemicals, the RBCs exceed possible concentrations at the target risks. In such cases, Dr. Smith rounded these numbers to the highest possible concentration, or 1E6 ppm. This type of truncation has been discontinued so that Table users can adjust the RBCs to a different target risk whenever necessary. For example, when screening chemicals at a target HQ of 0.1, noncarcinogenic RBCs may simply be divided by 10. Such scaling is not possible when RBCs are rounded. Users who are interested in truncation can also consult the Soil Screening Guidance for a discussion of “Csat,” the saturation concentration.

At Region III Superfund sites, noncancer RBCs are typically adjusted downward to correspond to a target HQ of 0.1 rather than 1. (This is done to ensure that chemicals with additive effects are not prematurely eliminated during screening. Note that the RBCs displayed on the table are shown at an HQ of 1; to arrive at the RBC at 0.1, data users must do the conversion themselves.) However, some chemicals have RBCs at HQs of 0.1 that are lower than their RBCs at 1E-6 cancer risk. In other words, the screening RBC would change from carcinogenic to noncarcinogenic. These chemicals are flagged with a “!” symbol. Therefore, assessors screening with adjusted RBCs will be alerted to this situation. See the companion attachment to the RBC Table, “Alternate RBCs,” for alternate values for “!” RBCs.

Earlier versions of this Table included a substitution of inhalation toxicity factors for oral factors whenever oral factors were unavailable (this applied only to groundwater and air, but not soil or fish). This practice was discontinued in order to minimize the uncertainty associated with such a conversion. The discontinuation of this practice did not significantly decrease the number of available RBCs.

The criterion for “VOC status” is in accordance with RAGS Part B: chemicals with Henry’s Law constants greater than 1E-5 and molecular weight less than 200 are marked as VOCs.

Earlier versions of this Table included soil screening levels (SSLs), when those values were available in draft form. Since the finalization of the SSL Guidance, risk assessors are urged to consult the final SSL Guidance directly. However, for generic use in Region III, the table now contains soil-to-groundwater SSLs in accordance with the new

guidance. For more information, see the Region III memo on SSLs, or consult the national SSL guidance directly (Soil Screening Guidance: User's Guide, April 1996, Publication 9355.4-23; and Soil Screening Guidance: Technical Background Document, May 1996; EPA/540/R-95/128; as well as Supplemental Guidance for Developing Soil Screening Levels for Superfund Sites, Peer Review Draft, March 2001; OSWER 9355.4-24).

You may notice there are two rows for uranium, one reflecting the IRIS (EPA consensus) value and the other reflecting a more recent, but provisional, value. Region III has shown both on this table, rather than choosing one over the other, to give Table users as much information as possible.

Vinyl chloride is handled differently from most other chemicals because of the unique aspects of its slope factor derivation. Readers are referred to the memo, Derivation of Vinyl Chloride RBCs, which is a companion document to this RBC Table.